

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW

40 EXCHANGE PLACE

18TH FLOOR

NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE

(212) 482-1303 FAX

WWW.TALKINLAW.COM

EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLIOTT CITY, MD 21042
410-964-0300

NEW JERSEY OFFICE:
79 MAIN STREET
SUITE ONE
HACKENSACK, NJ 07601
201-342-6665

February 11, 2020

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

BY ECF

Re: United States v. Geutys Laureano
10 Cr. 768 (PAE)

Dear Judge Engelmayer:

Earlier today, the Court modified defendant Geutys Laureano (“Laureano”) bond by setting several new release conditions including that Laureano may not travel to the Borough of Queens except as necessitated by his employment as delivery person. Unfortunately, I misunderstood Laureano when we discussed his current residence and it turns out that he lives in the Middle Village neighborhood of Queens. The specific location he is to avoid is in Ozone Park, Queens. These neighborhoods are 4.6 miles apart. For this reason, Laureano respectfully requests that the additional travel limitation not exclude him from Queens entirely but prohibit him from traveling within 2 miles of the Ozone Park, Queens neighborhood unless required to do so to execute his delivery duties. The government, by Assistant United States Attorney Samuel Rothschild, consents to this modification.

I apologize for any inconvenience created by my mistake. Thank you for Your Honor’s consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Samuel Rothschild (by ECF)

SO ORDERED.

2/11/2020

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge

GRANTED. The defendant's terms of pretrial supervision shall be amended to include travel within all parts of the SDNY & EDNY, save for a 2 mile radius of Ozone Park, Queens, unless this travel is for work related purposes for which he must notify his Pretrial Services Officer. The Clerk of Court is requested to terminate the motion at Dkt. No. 25.